

October 3, 2017

The Honorable Michael McCaul Chairman, House Committee on Homeland Security H2-176 Ford House Office Building 300 D St. SW Washington, DC 20515

Dear Chairman McCaul:

I am writing to express Airlines for America's (A4A) continued interest in and support of efforts to formulate a biometric exit program within U.S. Customs and Border Protection (CBP) in coordination with other security agencies and industry stakeholders. Specifically, we appreciate your attention to these concerns and support the concepts outlined in Section 205 of the "Border Security for America Act of 2017," which addresses many of our concerns.

As you know, airlines and other industry stakeholders have maintained five core policy principles we believe need to be addressed as CBP continues its work on implementing biometrics at our borders. Those five principles are:

- 1. Border security is an inherently governmental function. As such, biometric data collection and its associated costs should be managed by the U.S. Government.
- 2. Any biometric program should minimize operational disruption to airlines and passengers.
- 3. To be effective, a biometric exit program should be deployed uniformly at air, land and sea ports.
- 4. The Department of Homeland Security (DHS) should withdraw the outdated "2008 Notice of Proposed Rulemaking (NPRM) Concerning Collection of Alien Biometric Data Upon Exit from the United States at Air and Sea Ports of Departure; United States Visitor and Immigrant Status Indicator Technology Program (US-VISIT)."
- 5. Coordination between the Transportation Security Administration (TSA) and CBP in biometric capture is essential to ensure a streamlined experience for passengers as they move through the airport.

Section 205 of the Border Security for America Act of 2017 addresses many of these principles, and we support the inclusion of these provisions in the legislation.

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Finally, while this legislation is drafted to address border security, it is impossible to overstate the importance of close CBP coordination with TSA as the planning and implementation of this program continues. We believe this represents a great opportunity for CBP and TSA to collaborate to provide reliability, effectiveness, cost reduction and the minimization of passenger processing delays by deploying seamlessly-interfacing technologies at both the checkpoint and the gate. To address needed funding for CBP activities, we also support the repeal of the current diversion of passenger fees paid for the Electronic System for Travel Authorization to fund activities outside of CBP functions.

A4A looks forward to working with Congress and both federal agencies to promote this shared vision of a mutually beneficial and seamless biometric capture and identity validation system. We appreciate the close collaboration our member airlines have had with Congress and CBP throughout this process and we look forward to continued dialogue.

Sincerely,

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